

EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NASSAU

-----X
DEBORAH MAHONEY,

Plaintiff,

S U M M O N S

-against-

WHOLE FOODS MARKET GROUP, INC.,

Defendant.
-----X

**PLAINTIFF DESIGNATES NASSAU COUNTY AS PLACE OF TRIAL
BASIS OF VENUE IS PLAINTIFF'S RESIDENCE**

YOU ARE HEREBY SUMMONED to answer the Complaint in this action by serving your answer on plaintiffs' attorneys within 20 days after service of this summons, exclusive of the day of service, or within 30 days after service is complete if this summons is not personally delivered to you within the State of New York. In case of your failure to answer or appear, Judgment will be taken against you by default for the relief demanded in the Complaint.

Dated: Mineola, New York
November 20, 2020

PLAINTIFF'S ADDRESS:

DEBORAH MAHONEY
1 Quannaut Drive
Bayville, New York 11709

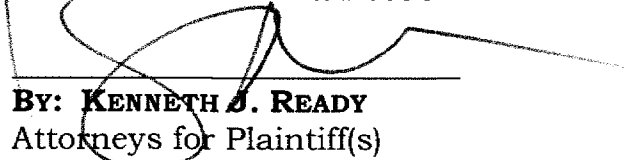
DEFENDANTS' ADDRESSES:

WHOLE FOODS MARKET GROUP, INC.
C/O
CT Corporation System
28 Liberty Street
New York, New York 10005

Yours, etc.

The Law Offices Of

KENNETH J. READY & ASSOCIATES


BY: **KENNETH J. READY**
Attorneys for Plaintiff(s)
1565 Franklin Avenue
Mineola, N.Y. 11501
516-741-6800

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NASSAU

-----X

DEBORAH MAHONEY,

Plaintiff,

**VERIFIED
COMPLAINT**

-against-

WHOLE FOODS MARKET GROUP, INC.,

Defendant.

-----X

Plaintiff, DEBORAH MAHONEY, through her attorneys, **KENNETH J. READY & ASSOCIATES**, complaining of defendant, WHOLE FOODS MARKET GROUP, INC., sets forth and alleges as follows:

1. At all times hereinafter mentioned, plaintiff, DEBORAH MAHONEY, was a resident of the State of New York, County of Nassau.

2. At all times hereinafter mentioned, defendant, WHOLE FOODS MARKET GROUP, INC., was a domestic corporation duly organized and existing under and by virtue of the laws of the State of New York.

3. At all times hereinafter mentioned, defendant, WHOLE FOODS MARKET GROUP, INC., was a foreign corporation transacting and/or doing and/or conducting and/or soliciting business within the State of New York.

4. At all times hereinafter mentioned, defendant, WHOLE FOODS MARKET GROUP, INC., was a business enterprise transacting and/or

doing and/or conducting and/or soliciting business within the State of New York.

AS AND FOR A FIRST CAUSE OF ACTION

5. At all times hereinafter mentioned, defendant, WHOLE FOODS MARKET GROUP, INC., owned the Whole Foods Store located at 1425 Central Avenue, Albany, New York.

6. At all times hereinafter mentioned, defendant, WHOLE FOODS MARKET GROUP, INC., maintained the Whole Foods Store located 1425 Central Avenue, Albany, New York.

7. At all times hereinafter mentioned, defendant, WHOLE FOODS MARKET GROUP, INC., managed the Whole Foods Store located 1425 Central Avenue, Albany, New York.

8. At all times hereinafter mentioned, defendant, WHOLE FOODS MARKET GROUP, INC., repaired the Whole Foods Store located 1425 Central Avenue, Albany, New York.

9. At all times hereinafter mentioned, defendant, WHOLE FOODS MARKET GROUP, INC., controlled the Whole Foods Store located 1425 Central Avenue, Albany, New York.

10. At all times hereinafter mentioned, defendant, WHOLE FOODS MARKET GROUP, INC., operated the Whole Foods Store located 1425 Central Avenue, Albany, New York.

11. At all times hereinafter mentioned, defendant, WHOLE FOODS MARKET GROUP, INC., supervised the Whole Foods Store located 1425 Central Avenue, Albany, New York.

12. At all times hereinafter mentioned, defendant, WHOLE FOODS MARKET GROUP, INC., set up the merchandise displays in the Whole Food Store located at 1425 Central Avenue, Albany, New York.

13. On or about July 21, 2019, plaintiff, DEBORAH MAHONEY, properly was at the Whole Foods Store located at 1425 Central Avenue, Albany, New York.

14. On or about July 21, 2019, the Whole Foods Store located at 1425 Central Avenue, Albany, New York was in a dangerous, defective, hazardous and unsafe condition.

15. On or about July 21, 2019, the Whole Foods Store located at 1425 Central Avenue, Albany, New York was in a dangerous, defective, hazardous and unsafe condition due to the negligence, recklessness, carelessness and culpability of defendant, WHOLE FOODS MARKET GROUP, INC.

16. On or about July 21, 2019, plaintiff, DEBORAH MAHONEY, was caused to fall at the Whole Foods Store located at 1425 Central Avenue, Albany, New York.

17. On or about July 21, 2019, plaintiff, DEBORAH MAHONEY, was caused to fall at the Whole Foods Store located at 1425 Central Avenue,

Albany, New York as a result of the negligence, recklessness, carelessness and culpability of defendant, WHOLE FOODS MARKET GROUP, INC.

18. On or about July 21, 2019, plaintiff, DEBORAH MAHONEY, was caused to sustain serious bodily at the Whole Foods Store located at 1425 Central Avenue, Albany, New York.

19. On or about July 21, 2019, plaintiff, DEBORAH MAHONEY, was caused to sustain serious bodily at the Whole Foods Store located at 1425 Central Avenue, Albany, New York due the negligence, recklessness, carelessness and culpability of defendant, WHOLE FOODS MARKET GROUP, INC.

20. By virtue of the foregoing, plaintiff, DEBORAH MAHONEY, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

AS AND FOR A SECOND CAUSE OF ACTION

21. Plaintiff, DEBORAH MAHONEY, repeats, reiterates and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

22. At all times hereinafter mentioned, the Whole Foods Store located at 1425 Central Avenue, Albany, New York was a mercantile establishment.

23. At all times hereinafter mentioned, defendant, WHOLE FOODS MARKET GROUP, INC., was responsible to equip the Whole Foods

Store located at 1425 Central Avenue, Albany, New York so as to provide reasonable protection to the safety of all persons frequenting said store.

24. At all times hereinafter mentioned, defendant, WHOLE FOODS MARKET GROUP, INC., was responsible to maintain the Whole Foods Store located at 1425 Central Avenue, Albany, New York so as to provide reasonable protection to the safety of all persons frequenting said store.

25. At all times hereinafter mentioned, defendant, WHOLE FOODS MARKET GROUP, INC., was required at all times to keep the Whole Foods Store located at 1425 Central Avenue, Albany, New York in safe condition.

26. At all times hereinafter mentioned, defendant, WHOLE FOODS MARKET GROUP, INC., was required at all times to keep the floors of the Whole Foods Store located at 1425 Central Avenue, Albany, New York in safe condition.

27. At all times hereinafter mentioned, the Whole Foods Store located at 1425 Central Avenue, Albany, New York was not equipped so as to provide reasonable protection to the safety of all persons frequenting said store.

28. At all times hereinafter mentioned, the Whole Foods Store located at 1425 Central Avenue, Albany, New York was not maintained so as to provide reasonable protection to the safety of all persons frequenting said store.

29. At all times hereinafter mentioned, the Whole Foods Store located at 1425 Central Avenue, Albany, New York was not kept in safe condition.

30. At all times hereinafter mentioned, the floors of the Whole Foods Store located at 1425 Central Avenue, Albany New York were not kept in safe condition.

31. At all times hereinafter mentioned, defendant, WHOLE FOODS MARKET GROUP, INC., failed adequately and properly to maintain and equip the Whole Foods Store located at 1425 Central Avenue, Albany, New York so as to provide a reasonable protection to the safety of all persons frequenting said store.

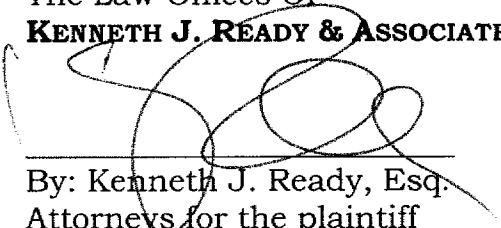
32. At all times hereinafter mentioned, defendant, WHOLE FOODS MARKET GROUP, INC., was in violation of New York Labor Law 376 and/or related promulgations in the ownership, maintenance, supervision, safekeeping and operation of the Whole Foods Store located at 1425 Central Avenue, Albany, New York.

33. On or about July 21, 2019, defendant's failure to comply with New York Labor Law 376 and/or related promulgations was a proximate cause of plaintiff, DEBORAH MAHONEY, sustaining injury.

WHEREFORE, plaintiff, DEBORAH MAHONEY, demands judgment against defendant, WHOLE FOODS MARKET GROUP, INC., as follows: in First Cause of Action, in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York; in Second Cause of Action, in the amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York; together with interest, costs and disbursements of this action.

Dated: Mineola, New York
November 20, 2020

The Law Offices Of
KENNETH J. READY & ASSOCIATES



By: Kenneth J. Ready, Esq.
Attorneys for the plaintiff
1565 Franklin Avenue
Third Floor
Mineola, New York, 11501

VERIFICATION

STATE OF NEW YORK

SS:

COUNTY OF NASSAU

Deborah Mahoney, being duly sworn, says:

I am the plaintiff in the action herein. I have read the annexed

Summons & Verified Complaint

and know the contents thereof, and the same are true to my knowledge, except those matters therein which are stated to be alleged upon information and belief, and as to those matters we believe them to be true. My belief as to those matters therein not stated upon knowledge, is based upon facts, records, and other pertinent information contained in my personal files.

Dated: Mineola, New York
11/27, 2020


Deborah Mahoney

Subscribed and sworn to before me
this 27th day of November, 2020


NOTARY PUBLIC

Denise M. Beaudette
Notary Public State of New York
Qualified in Franklin County
Commission Expires: June 30, 2022

August 5, 2024

Index No.
SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NASSAU

DEBORAH MAHONEY,
Plaintiff(s),

-against-

WHOLE FOODS MARKET GROUP, INC.,
Defendant(s).

SUMMONS & VERIFIED COMPLAINT

KENNETH J. READY & ASSOCIATES
ATTORNEYS FOR PLAINTIFF(S)
1565 FRANKLIN AVENUE
MINEOLA, NEW YORK 11501
(516) 741-6800

To:

Attorney(s) for

Service of a copy of the within is hereby admitted.

Dated:

Attorney(s) for

Sir: Please take notice

NOTICE OF ENTRY

that the within is a (certified) true copy of a
entered in the office of the Clerk of the within named
Court on

20__.

NOTICE OF SETTLEMENT

that an Order
presented to the Hon.
the
judges of the within named Court, at
on

of which the within is a true copy will be
, one of

Dated:

KENNETH J. READY & ASSOCIATES
ATTORNEYS FOR PLAINTIFF(S)

To: